

Pldgs #2

UNITED STATES DISTRICT COURT  
DISTRICT OF MAINE

FEDERAL TRADE COMMISSION,

Plaintiff,

v.

CIVIL NO.

IWORX, a corporation, and

SELFWORX.COM, LLC, and

JEFFREY V. KRAL,

Defendants.

**PLAINTIFF'S COMPLAINT FOR PERMANENT  
INJUNCTION AND OTHER EQUITABLE RELIEF**

Plaintiff Federal Trade Commission ("FTC" or "Commission"), through its undersigned attorneys, for its Complaint alleges:

1. Plaintiff Federal Trade Commission brings this action under Section 13(b) of the Federal Trade Commission Act ("FTC Act"), 15 U.S.C. § 53(b), to secure a permanent injunction, rescission of contracts and restitution, disgorgement of ill-gotten gains, and other equitable relief against the defendants for engaging in deceptive acts or practices and false advertisements for food, drugs, devices, services or cosmetics, in or affecting commerce in connection with the advertising, marketing and sale of gel•x•thin™ and Ultra LipoLean in violation of Sections 5(a) and 12 of the FTC Act, 15 U.S.C. §§ 45(a) and 52.

## JURISDICTION AND VENUE

2. This Court has jurisdiction over this matter pursuant to 15 U.S.C. §§ 45(a), 52 and 53(b), and 28 U.S.C. §§ 1331, 1337(a) and 1345.

3. Venue in this District is proper under 15 U.S.C. § 53(b) and 28 U.S.C. § 1391(b) and 1391(c).

## THE PARTIES

4. **Plaintiff Federal Trade Commission** is an independent agency of the United States Government created by statute. 15 U.S.C. §§ 41-58. The Commission enforces Section 5(a) of the FTC Act, 15 U.S.C. § 45(a), which prohibits unfair or deceptive acts or practices in or affecting commerce. The Commission also enforces Section 12 of the FTC Act, 15 U.S.C. § 52, which prohibits false advertisements for food, drugs, devices, services or cosmetics in or affecting commerce. The Commission, through its own attorneys, may initiate federal district court proceedings to enjoin violations of the FTC Act and to secure such equitable relief, including rescission of contracts and restitution, and the disgorgement of ill-gotten gains caused by defendants' law violations, as may be appropriate in each case. 15 U.S.C. § 53(b).

5. **Defendant Iworx** is a Maine corporation with offices located at 51 U.S. Route 1, Nonesuch River Plaza-Suite 1, Scarborough, Maine 04074. Iworx transacts and has transacted business in the District of Maine.

6. **Defendant Selfworx.com LLC** ("Selfworx") is a Maine "Limited Liability Company" with offices located at 51 U.S. Route 1, Nonesuch River Plaza-Suite 1, Scarborough, Maine 04074. Selfworx transacts and has transacted business in the District of Maine.

7. **Defendant Jeffrey V. Kral** is the president and manager of Selfworx and Iworx. At all times relevant to this Complaint, acting individually or in concert with others, defendant Kral has

formulated, directed, controlled or participated in the acts or practices of the corporate defendants, including the acts or practices alleged in this Complaint. Defendant Kral resides in the District of Maine, and he transacts or has transacted business in the District of Maine.

### COMMERCE

8. The acts and practices of defendants alleged in this Complaint are in or affecting commerce, as "commerce" is defined in Section 4 of the FTC Act, 15 U.S.C. § 44.

### DEFENDANTS' COURSE OF CONDUCT

9. Since at least 2003, defendants have advertised, promoted, offered for sale and sold products to the public throughout the United States, including two purported weight-loss products called gel•ä•thin™ and Ultra LipoLean (LipoLean).

10. gel•ä•thin is a topical gel. A one-month supply of gel•ä•thin costs \$59.95, including shipping and handling.

11. Defendants advertise and offer gel•ä•thin for sale through full-page advertisements in national magazines and newspapers, and on the Internet. The advertisements direct consumers to dial an "800" number to order the product.

12. To induce consumers to purchase gel•ä•thin, defendants have disseminated or caused to be disseminated advertisements for gel•ä•thin that include, but are not limited to, the advertisements attached hereto as Exhibit A (COSMOPOLITAN, January 2004), Exhibit B (COMPLETE WOMAN, December 2003) and Exhibit C (Sunday newspaper supplements, including Cleveland, Ohio, SUN NEWSPAPERS, the week of March 28, 2004). These advertisements contain the following statements or depictions, among others:

**gel•ä•thin™** introduces its scientifically advanced topical gel that melts away cellulite. A Flatter, Sexier Tummy and Butt in Days! (*Exhibit A.*)

#### Breakthrough Topical Gel

##### Emulsifies, Shrinks Fat on Contact

Introducing **gel•ä•thin™**, the scientifically advanced formula that helps tighten your skin and melts away the appearance of stubborn cellulite with ease. This breakthrough formula with natural ingredients targets cellulite and dissolves fat deposits on hips and thighs—even that tummy pouch. When diet and exercise aren't enough to tone those problem areas, **gel•ä•thin™** helps dissolve fat in days! (*Exhibit A.*)

#### Reduce Cellulite-Affected Areas and Firm Up

##### Sculpt Your Body in Ways You Never Thought Possible!

Just apply **gel•ä•thin™** to any area of your body that you want to be slimmer, smoother, and sexier! **gel•ä•thin™** works on almost any part of the body, including your buttocks, arms, chin, and neck! You can spot-reduce unwanted fat and unsightly lumps and bumps almost anywhere on your body safely and effectively without liposuction! (*Exhibit A.*)

Photo  
of  
"Doctor"

Reduce Cellulite-  
Affected Areas

#### Clinically Proven

(Concentrate Rhodofiltrat®-HG)

Clinical studies document that the ingredients and concentrate in **gel•ä•thin's™** advanced formula help to reduce fat deposits on contact. Simply put, the active ingredients in **gel•ä•thin™** cause the appearance of fat cells to essentially "melt away" and release stored fat with every application.

The evidence is conclusive—see for yourself.

**gel•ä•thin™** helps to sculpt your body and reduce the ugly appearance of cellulite while firming and tightening your skin.

(*Exhibit A.*)

**gel•ä•thin™** penetrates skin and emulsifies cellular fat. (Releases then forces fat lipids out of the adipose tissue cells.)

Fat lipids shrink and are forced into the bloodstream to be used as energy. Skin tightens.

Emulsifies stubborn fat on contact.  
Thighs, butt, & tummy...naturally, without the risk of surgery.

*(Exhibit A.)*

#### **Listen to these former skeptics:**

\* \* \*

"... I lost 6 inches and 21 lbs. with Gelathin in only 6 weeks!  
Now I can walk the beach without a towel around my waist. . ."  
-Maria N. *(Exhibits A, B and C.)*

#### **Tomorrow's fat-loss technology today!**

*(Exhibit A.)*

#### **Exciting New Breakthrough!!**

##### **gel•ä•thin™ Body Toning System**

introducing **gel•ä•thin™** body toning system which uses scientifically advanced, natural ingredients for tighter skin, and to melt away the appearance of stubborn cellulite in your problem areas. This breakthrough system targets and dissolves the appearance of cellulite and fat deposits on hips and thighs—even that tummy pouch. When diet and exercise aren't enough, **gel•ä•thin™** system works in days wherever it's applied. It's that fast and easy!  
*(Exhibit B.)*

#### **Reduce Cellulite-Affected Areas and Firm Up**

Sculpt Your Body in Ways You Never Thought Possible!

Just apply **gel•ä•thin™** to any area of your body that you want to be slimmer, smoother, and sexier looking! **gel•ä•thin™** works on almost any part of the body, including your buttocks, arms, chin, and neck! You can spot-reduce the appearance of unwanted fat and unsightly lumps and bumps almost anywhere on your body safely and effectively without expensive medical procedures. *(Exhibit B.)*

**Wouldn't You Love a  
Flatter, Sexier Tummy  
and Butt in 19 Days?**

\* \* \*

Photo  
of  
"Doctor"

**Advanced Ingredients**

(Concentrate Rhodofiltrat®-HG)

The advanced ingredient Concentrate Rhodofiltrat®-HG, a natural extract, is doctor

recommended and makes the **gel•ä•thin™** program unlike any other body toning system. Simply apply **gel•ä•thin™** to any area of your body that you want to be slimmer, smoother, and sexier looking and follow the easy, step by step **gel•ä•thin™** program. The gel is light and absorbs fast, and the system couldn't be simpler. Now you can spot-reduce the appearance of unwanted fat and unsightly lumps and bumps almost anywhere on your body! When diet and exercise aren't enough, the **gel•ä•thin™** system works in days wherever it's applied – arms, neck, hips, butt and thighs, even that tummy pouch!  
(Exhibit C.)

**Breakthrough System**

**Guaranteed Results within 30 days**

Are you tired of that stubborn, unsightly fat in your problem areas? Are you wasting \$200, \$500, even \$1,000 in clothes that just don't fit anymore? Are you serious about having a flatter, sexier tummy and butt? Now you can shed pant or dress sizes quickly, without ephedra or stimulants. You can have tighter arms, leaner thighs and a more shapely waist without starvation diets or strenuous exercise. See for yourself: the **gel•ä•thin™** system is guaranteed to give you results within 30 days or you get a refund. You have nothing but weight to loose! (Exhibit C.)

13. Ultra LipoLean ("LipoLean") is a dietary supplement in tablet form. A one-month supply costs \$39.95 plus shipping and handling. It is advertised on the Internet, and, as with **gel•ä•thin**, consumers are directed to call an "800" number to order the product.

14. To induce consumers to purchase LipoLean, defendants have disseminated or caused to be disseminated advertisements for LipoLean that include, but are not limited to, the Internet advertisement attached hereto as Exhibit D.<sup>1</sup> This advertisement contains the following statements or depictions, among others:

**Lose pant or dress sizes in weeks!**

**"Revolutionary patented formula now absorbs up to 300% more fat!"**

Introducing Ultra LipoLean, the most comprehensive fat-reduction and weight-management product available! With Ultra LipoLean's fast-acting formula, you'll achieve your weight-loss goals faster and easier, without giving up your favorite foods!

**Benefits:**

Scientifically advanced system

Contains all-natural ingredients — No Ephedra, no stimulants, No jitters.

No complicated fat gram counting—eat the foods you love

Convenient and fast-acting

To order your risk-free trial of Ultra LipoLean by check, money order or credit card, call 1-800-308-5590.

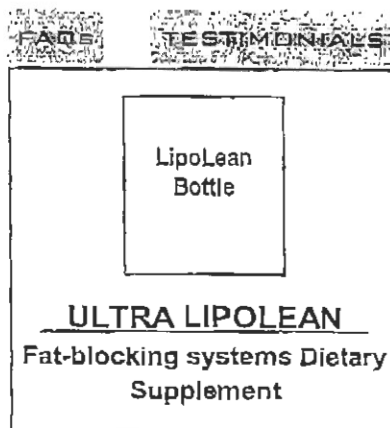
*(Exhibit D.)*

**Recommended use:** As a dietary supplement, take two (2) tablets with an 8 oz. glass of water, twice daily. Once, 1 to 5 minutes before mid-day meal and once, 1 to 5 minutes before evening meal and drink plenty of water. *(Exhibit D.)*

**WARNING:** Since Ultra LipoLean is so effective at removing fat and cellulite, some people may experience rapid weight loss. Do not allow yourself to become too thin. If you start to loose *[sic]* weight too quickly, skip a day or two of use. *(Exhibit D.)*

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<sup>1</sup> [www.selfworx.com/LIPOLEAN/lipolean.html](http://www.selfworx.com/LIPOLEAN/lipolean.html).



(Exhibit D.)

What makes Ultra LipoLean different from and more effective than any other fat binder, fat blocker or product containing chitosan?

Ultra LipoLean is different from and more effective than other weight-loss supplements because it contains a powerful patented combination of ingredients called Liposan. Derived by the most advanced technology and processing techniques, Liposan has superior solubility meaning that it breaks down faster than any other fat binder. It also has the highest density and the most superior fat-binding performance available. Within one minute Ultra LipoLean *[sic]* has an 85-to-18 comparison to the top fat binder in fat absorption. Only two tablets of the amazing Ultra LipoLean can absorb up to 20 to 30 grams of fat from a meal. Other fat binders take up to 60 minutes to break down and it takes 10 to 15 tablets to absorb 20 to 30 grams of fat. By using Ultra LipoLean in combination with the "Rapid Weight Loss Guide," you'll experience the easiest, most effective weight-loss-management system available. (Exhibit D.)

How does Ultra LipoLean work?

Ultra LipoLean is a unique, naturally occurring substance derived from the shells of crabs and shrimp, as well as other shellfish fiber (Liposan Ultra), which is chemically attracted to fat and acts as a fat-absorbing sponge inside your body. Within one to five minutes of entering your system, the powerful blend of Ultra LipoLean ingredients absorbs and binds to fat, and turns it into a mass that your body can't digest. The mass of fat is passed through your body undigested, which means the fat you eat never has a chance to be stored as unwanted fat on your body in places like your inner and outer thighs, your stomach, under your chin, on your arms, etc. And because Ultra LipoLean neutralizes fat after it enters your stomach, the fat has no effect on your body, which forces your body to burn off your already-stored body fat. With the amazing new Ultra LipoLean formula, it's never been easier to get rid of fat, lose weight, and have the LEAN, sculpted body you've always wanted! (Exhibit D.)



Why am I not losing weight as quickly as my friends who are also using Ultra LipoLean?

It's essential that you take Ultra LipoLean as directed for best results. Many people forget to take Ultra LipoLean twice a day, or they skip meals. In addition, many people find that when they exercise, they may not lose weight, but their amount of body fat decreases so there is a loss of inches around the stomach, legs, arms, etc. Also, eating more sensibly with less fat in your diet is recommended to speed up your results.

*(Exhibit D.)*

Can I take more than the recommended dosage?

After two weeks of use, many people prefer to take one or two extra tablets with lunch and dinner to speed up and maximize the results. This is satisfactory with the approval of a physician. *(Exhibit D.)*

How much weight will I lose?

Many people lose two-four pounds per week, although results can vary between individuals. *(Exhibit D.)*

"... Ultra LipoLean is the first diet aid product that has worked for me. I have been taking only 2 (tablets) a day and I have lost 20 lbs in 2 months... I really like the fact that it has no side effects, no shaking or nervousness."

—Sue T.

*(Exhibit D.)*

#### THE FEDERAL TRADE COMMISSION ACT

15. Section 5(a) of the FTC Act, 15 U.S.C. § 45(a), prohibits unfair or deceptive acts or practices in or affecting commerce. Section 12(a) of the FTC Act, 15 U.S.C. § 52(a), prohibits the dissemination of any false advertisement in or affecting commerce for the purpose of inducing, or which is likely to induce, the purchase of food, drugs, devices, services or cosmetics. For the

purposes of Section 12 of the FTC Act, 15 U.S.C. § 52, gel•ä•thin and LipoLean are each a "food" or "drug" as defined in Sections 15(b) and (c) of the FTC Act, 15 U.S.C. §§ 55(b) and (c). As set forth below, defendants have engaged and continue to engage in violations of Sections 5(a) and 12 of the FTC Act in connection with the advertising, marketing and sale of gel•ä•thin and LipoLean.

## COUNT ONE

### False Claims for gel•ä•thin

16. Through the means described in Paragraph 12, including through the statements and depictions contained in the advertisements attached as Exhibits A-C, defendants have represented, expressly or by implication, that:

- a. gel•ä•thin causes rapid and substantial weight loss, including as much as twenty-one pounds in six weeks, without the need to reduce caloric intake or increase exercise;
- b. gel•ä•thin, when rubbed into the skin, causes substantial weight loss;
- c. gel•ä•thin dissolves fat deposits in days;
- d. gel•ä•thin dissolves and removes cellulite from the body;
- e. scientific studies demonstrate that gel•ä•thin will reduce fat and cellulite deposits on contact.

17. In truth and in fact:

- a. gel•ä•thin does not cause rapid and substantial weight loss, including as much as twenty-one pounds in six weeks, without the need to reduce caloric intake or increase exercise;
- b. gel•ä•thin, when rubbed into the skin, does not cause substantial weight loss;

- c. gel•ä•thin does not dissolve fat deposits in days;
- d. gel•ä•thin does not dissolve and remove cellulite from the body;
- e. scientific studies do not demonstrate that gel•ä•thin will reduce fat and cellulite deposits on contact.

18. Therefore, the making of the representations set forth in Paragraph 16 above constitutes a deceptive practice, and the making of false advertisements, in or affecting commerce, in violation of Sections 5(a) and 12 of the FTC Act, 15 U.S.C. §§ 45(a) and 52.

## COUNT TWO

### Unsubstantiated Claims for gel•ä•thin

19. Through the means described in Paragraph 12, including through statements contained in the advertisements attached as Exhibits A-C, defendants have represented, expressly or by implication that gel•ä•thin: (a) causes rapid and substantial weight loss, including as much as twenty-one pounds in six weeks, without the need to reduce caloric intake or increase exercise; (b) when rubbed into the skin, causes substantial weight loss; (c) dissolves fat deposits in days; and (d) dissolves and removes cellulite from the body.

20. In truth and in fact, defendants did not possess and rely upon a reasonable basis to substantiate the representations for gel•ä•thin set forth in Paragraph 16 above at the time the representations were made.

21. Therefore, the making of the representations as set forth in Paragraph 19 above constitutes a deceptive practice and the making of false advertisements, in or affecting commerce, in violation of Sections 5(a) and 12 of the FTC Act, 15 U.S.C. §§ 45 (a) and 52.

### COUNT THREE

#### False Claims for LipoLean

22. Through the means described in Paragraph 14, including the statements and depictions contained in the advertisement attached as Exhibit D, defendants have represented, expressly or by implication, that:

- a. LipoLean causes rapid and substantial weight loss, including as much as four pounds or more per week, without the need to reduce caloric intake or increase exercise;
- b. only two tablets of LipoLean absorb 20 to 30 grams of fat from a meal.

23. In truth and in fact:

- a. LipoLean does not cause rapid and substantial weight loss, including as much as four pounds or more per week, without the need to reduce caloric intake or increase exercise;
- b. two tablets of LipoLean do not absorb 20-30 grams of fat from a meal.

24. Therefore, the making of the representations set forth in Paragraph 22 above constitutes a deceptive practice and the making of false advertisements, in or affecting commerce, in violation of Sections 5(a) and 12 of the FTC Act, 15 U.S.C. §§ 45 (a) and 52.

### COUNT FOUR

#### Unsubstantiated Claims for LipoLean

25. Through the means described in Paragraph 14, including through the statements contained in the advertisement attached as Exhibit D, defendants have represented, expressly or by implication, that LipoLean: (a) causes rapid and substantial weight loss, including as much as four pounds or more per week, without the need to reduce caloric intake or increase exercise; and (b) only two tablets of LipoLean absorb 20-30 grams of fat from a meal.

26. In truth and in fact, defendants did not possess and rely upon a reasonable basis to substantiate the representations set forth in Paragraph 25 at the time the representations were made.

27. Therefore, defendants' representations as set forth in Paragraph 25 above are false or misleading and constitute a deceptive practice and the making of false advertisements, in or affecting commerce, in violation of Sections 5(a) and 12 of the FTC Act, 15 U.S.C. §§ 45 (a) and 52.

### **INJURY**

28. Consumers throughout the United States have suffered and continue to suffer substantial monetary loss as a result of defendants' unlawful acts or practices. In addition, the defendants have been unjustly enriched as a result of their unlawful practices. Absent injunctive relief by this Court, the defendants are likely to continue to injure consumers, reap unjust enrichment, and harm the public interest.

### **THIS COURT'S POWER TO GRANT RELIEF**

29. Section 13(b) of the FTC Act, 15 U.S.C. § 53(b), empowers this Court to grant injunctive and such other relief as the Court may deem appropriate to halt and redress violations of the FTC Act. The Court, in the exercise of its equitable jurisdiction, may award other ancillary relief, including but not limited to, rescission of contracts and restitution, and the disgorgement of ill-gotten gains, to prevent and remedy injury caused by defendants' law violations.

### **PRAYER FOR RELIEF**

Wherefore, plaintiff FTC, pursuant to Section 13(b) of the FTC Act, 15 U.S.C. § 53(b), and the Court's equitable powers, requests that this Court:

(a) Award plaintiff such preliminary injunctive and ancillary relief as may be necessary to avert the likelihood of consumer injury during the pendency of this action and to preserve the possibility of effective final relief, including, but not limited to temporary and preliminary injunctions;

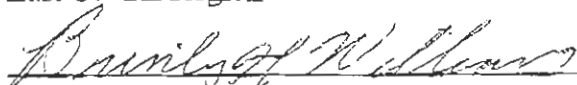
- (b) Permanently enjoin defendants from violating the FTC Act as alleged herein;
- (c) Award such equitable relief as the Court finds necessary to redress injury to consumers resulting from defendants' violations of Sections 5(a) and 12 of the FTC Act, including, but not limited to, rescission of contracts and restitution, and the disgorgement of ill-gotten gains by the defendants; and
- (d) Award plaintiff the costs of bringing this action, and such other equitable relief as the Court may determine to be just and proper.

Dated: October 27, 2004

Respectfully submitted,

**WILLIAM E. KOVACIC**  
General Counsel  
Federal Trade Commission  
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East Central Region

  
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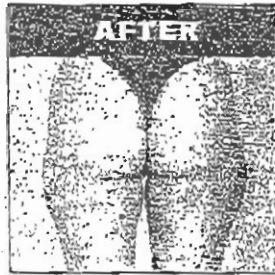
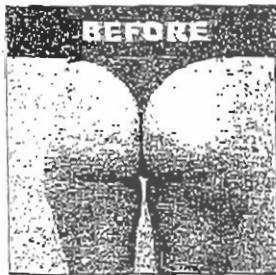
**COUNSEL FOR PLAINTIFF**  
**FEDERAL TRADE COMMISSION**  
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Eaton Center  
1111 Superior Avenue, Suite 200  
Cleveland, Ohio 44114-2507

gel-a-thin™ introduces its scientifically advanced topical gel that melts away cellulite.

# A Flatter, Sexier Tummy and Butt in Days!

## Breakthrough Topical Gel Emulsifies, Shrinks Fat on Contact

Introducing gel-a-thin™, the scientifically advanced formula that helps tighten your skin and melts away the appearance of stubborn cellulite with ease. This breakthrough formula with natural ingredients targets cellulite and dissolves fat deposits on hips and thighs—even that tummy pouch. When diet and exercise aren't enough to tone those problem areas, gel-a-thin™ helps dissolve fat in days!



## Reduce Cellulite-Affected Areas and Firm Up

Sculpt Your Body in Ways You Never Thought Possible! Just apply gel-a-thin™ to any area of your body that you want to be slimmer, smoother, and sexier! gel-a-thin™ works on almost any part of the body, including your buttocks, arms, chin, and neck! You can spot-reduce unwanted fat and unsightly lumps and bumps almost anywhere on your body safely and effectively without liposuction!

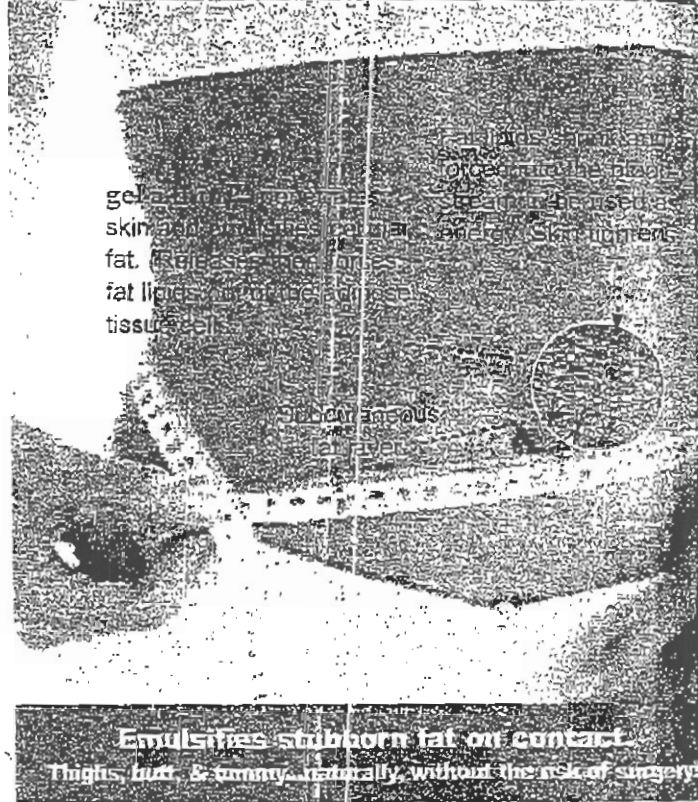


Reduce Cellulite-Affected Areas

## Clinically Proven

(Concentrate Rhodofiltrat®-HG)

Clinical studies document that the ingredients and concentrate in gel-a-thin's™ advanced formula help to reduce fat deposits on contact. Simply put, the active ingredients in gel-a-thin cause the appearance of fat cells to essentially "melt away" and release stored fat with every application. The evidence is conclusive—see for yourself. gel-a-thin™ helps to sculpt your body and reduce the ugly appearance of cellulite while firming and tightening your skin.



## Listen to these former skeptics:

"gel-a-thin™ is absolutely amazing! My thighs haven't been this smooth and firm since I was a teenager!" -Lori B.

"...I lost 6 inches and 21 lbs. with Gelathin in only 6 weeks! Now I can walk the beach without a towel around my waist!" -Maria N.

"I've never felt better in my bikini! gel-a-thin™ worked wonders on my stomach, buttocks, and thighs. The results were quick and easy. I wish I would have tried it sooner!" -Cheryl W.

**Call now for a risk-free trial** and ask how to get a **FREE SUPPLY** with your order.

**1-888-269-6656**

Guaranteed results for 30 days, or you don't pay!  
**Tomorrow's fat-loss technology today!**

Risk-free Trial Code: 343

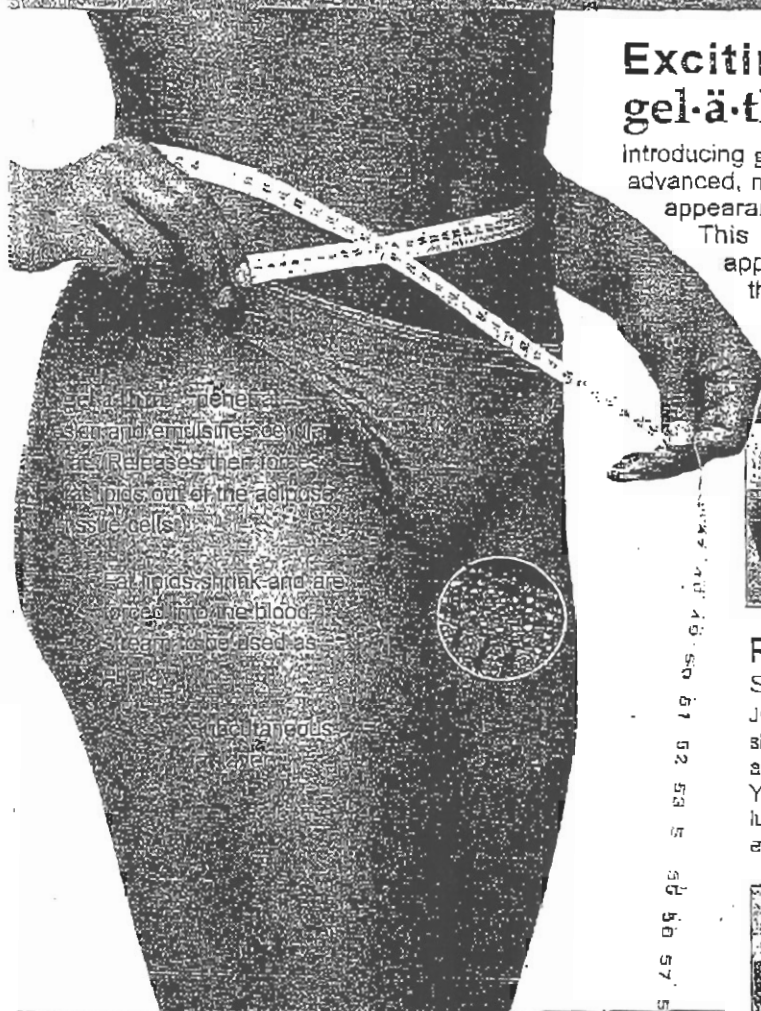
Reduce body fat around your hips, waist, thighs, buttocks, stomach, arms, chin, and neck.



gel-ä-thin™

introduces its scientifically advanced Body Toning System

# A Flatter, Sexier Tummy and Butt in Days!



gel-ä-thin™ penetrates and emulsifies cellular fat. Releases them from fat cells out of the adipose tissue cells.

Fat lipids shrink and are forced into the blood stream to be used as energy.

Macrophages

**Emulsifies stubborn fat on contact.**

Thighs, butt, & tummy...naturally, without the risk of surgery!

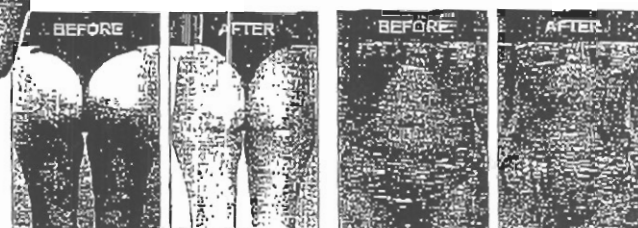
"gel-ä-thin™ is absolutely amazing! My thighs haven't been this smooth and firm since I was a teenager!" -Lori B.

"...I lost 6 inches and 21 lbs. with Gelathin in only 6 weeks! Now I can walk the beach without a towel around my waist..." -Marla N.

"I've never felt better in my bikini! gel-ä-thin™ worked wonders on my stomach, buttocks, and thighs. The results were quick and easy. I wish I would have tried it sooner!" -Cheryl W.

## Exciting New Breakthrough!! gel-ä-thin™ Body Toning System

Introducing gel-ä-thin™ body toning system which uses scientifically advanced, natural ingredients for tighter skin, and to melt away the appearance of stubborn cellulite in your problem areas. This breakthrough system targets and dissolves the appearance of cellulite and fat deposits on hips and thighs—even that tummy pouch. When diet and exercise aren't enough, gel-ä-thin™ system works in days wherever it's applied. It's that fast and easy!



### Reduce Cellulite-Affected Areas and Firm Up Sculpt Your Body in Ways You Never Thought Possible!

Just apply gel-ä-thin™ to any area of your body that you want to be slimmer, smoother, and sexier looking! gel-ä-thin™ works on almost any part of the body, including your buttocks, arms, chin, and neck! You can spot-reduce the appearance of unwanted fat and unsightly lumps and bumps almost anywhere on your body safely and effectively without expensive medical procedures.



Reduce Cellulite-Affected Areas

### Advanced Ingredients (Concentrate Rhodofilat®-HG)

The ingredients and concentrate in gel-ä-thin's™ advanced formula help to reduce fat deposits on contact. Simply put, the active ingredients in gel-ä-thin™ cause the appearance of fat cells to essentially "melt away" and release stored fat with every application. The evidence is conclusive—see for yourself. gel-ä-thin™ helps to sculpt your body and reduce the ugly appearance of cellulite while your skin becomes tighter and firmer looking.

**Call now for a risk-free trial** and ask how to get a **FREE SUPPLY** with your order. (toll-free call)

# 1-800-797-1433

Guaranteed results for 30 days, or you don't pay!  
**Tomorrow's fat-loss technology today!**

Risk-free Trial Code: 343

Reduce the appearance of body fat around your hips, waist, thighs, buttocks, stomach, and chin.

**Exhibit B**



# Wouldn't You Love a Flatter, Sexier Tummy and Butt in 19 Days?

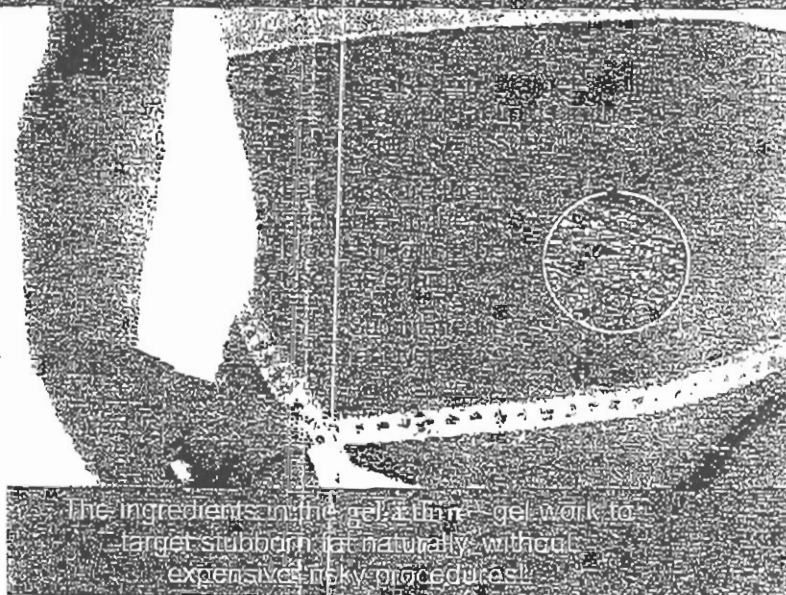
gel-ä-thin™ introduces its  
scientifically advanced  
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## Advanced Ingredients

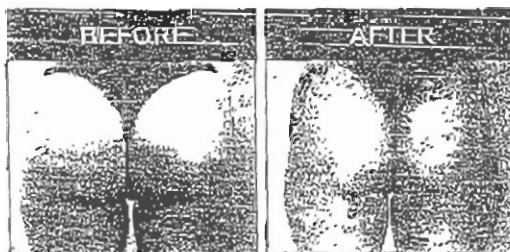
(Concentrate Rhodofiltrat®-HG)

The advanced ingredient Concentrate Rhodofiltrat®-HG, a natural extract, is doctor recommended and makes the gel-ä-thin™ program unlike any other body toning system. Simply apply gel-ä-thin™ to any area of your body that you want to be slimmer, smoother, and sexier looking and follow the easy, step by step gel-ä-thin™ program. The gel is light and absorbs fast, and the system couldn't be simpler. Now you can spot-reduce the appearance of unwanted fat and unsightly lumps and bumps almost anywhere on your body! When diet and exercise aren't enough, the gel-ä-thin™ system works in days wherever it's applied — arms, neck, hips, butt and thighs, even that tummy pouch!



The ingredients in the gel-ä-thin™ gel work to target stubborn fat naturally without expensive risky procedures!

## Reduce Cellulite-Affected Areas and Firm Up



## Listen to these former skeptics:



"Gel-ä-thin™ is absolutely amazing! My thighs haven't been this smooth and firm since I was a teenager!" -Lori B.



"...I lost 6 inches and 21 lbs. with gel-ä-thin™ in only 6 weeks! Now I can walk the beach without a towel around my waist..." -Marla N.

and/or results may vary. These statements have not been evaluated by the Food and Drug Administration and are not intended to diagnose, cure or prevent any disease.

## Breakthrough System

Guaranteed Results within 30 days

Are you tired of that stubborn, unsightly fat in your problem areas? Are you wasting \$200, \$500, even \$1,000 in clothes that just don't fit anymore? Are you serious about having a flatter, sexier tummy and butt? Now you can shed pant or dress sizes quickly, without ephedra or stimulants. You can have tighter arms, leaner thighs and a more shapely waist without starvation diets or strenuous exercise. See for yourself: the gel-ä-thin™ system is guaranteed to give you results within 30 days or you get a refund. You have nothing but weight to loose!

CALL NOW for a 30-Day Risk-Free Trial of gel-ä-thin™  
Ask how to get a FREE SUPPLY with your purchase

TOLL FREE  
24 HOURS  
A DAY

**1-888-269-6626**

MasterCard International  
at your service 24 hours a day

Discover  
Network

VISA

AMEX

MASTERCARD

DISCOVER

AMERICAN EXPRESS

Ask about our products to manage cars!

Mention Risk-Free Trial Code 12B and ask how to receive up to  
**40% OFF your order of gel-ä-thin™!**

And that's not all! **PURCHASE NOW** and you will also receive a supply of gel-ä-thin™ Weight-Loss  
Tablets, and the gel-ä-thin™ Ultra-Guide to Rapid Weight-Loss, a \$50 value.

**ABSOLUTELY FREE!!\***

\*Supplies are limited, gel-ä-thin™ is not sold in stores.

Exhibit C

Page 1 of 1



**Lose pant or dress sizes in weeks!**

**"Revolutionary patented formula now absorbs up to 300% more fat!"**

Introducing Ultra LipoLean, the most comprehensive fat-reduction and weight-management product available! With Ultra LipoLean's fast-acting formula, you'll achieve your weight-loss goals faster and easier, without giving up your favorite foods!



**Benefits:**

Scientifically advanced system  
 Contains all-natural ingredients – No Ephedra, no stimulants, No jitters.  
 No complicated fat gram counting—eat the foods you love  
 Convenient and fast-acting

To order your risk-free trial of Ultra LipoLean by check, money order or credit card, call 1-800-308-5590.

Ask how to receive the "Guide to Rapid Weight Loss" FREE with your order!

NEXT





### ULTRA LIPOLEAN PRODUCT INFORMATION:

Tablet Count: 120



**Recommended use:** As a dietary supplement, take two (2) tablets with an 8 oz. glass of water, twice daily. Once, 1 to 5 minutes before mid-day meal and once, 1 to 5 minutes before evening meal and drink plenty of water.

**Disclaimer:** Do not take if you are allergic to shellfish. Not for use by pregnant to lactating women. Fat-soluble vitamins, essential fatty acids, oral contraception and medications should be taken 4 hours before or after ingesting this product. As with any supplement, if you are taking any medications, or if you are under the supervision of a healthcare professional, consult with your physician before taking this product. These statements have not been evaluated by the Food and Drug Administration. This product is not intended to diagnose, treat, cure or prevent any disease.

**WARNING:** Since Ultra LipoLean is so effective at removing fat and cellulite, some people may experience rapid weight loss. Do not allow yourself to become too thin. If you start to loose weight too quickly, skip a day or two of use.

To order your risk-free trial of Ultra LipoLean by check, money order or credit card, call 1-800-308-5590.

SACK





CALL FOR TODAY'S SPECIAL PRICING  
**1-800-308-5590**

COMMITTED TO HEALTH AND  
SELF-IMPROVEMENT THAT WORKS

SHOWS

RESULTS

MONEY SAVED

TESTIMONIALS

CONTAINS NO ARTIFICIAL INGREDIENTS

Click on images below for more product information.

To place a credit card order call 1-800-308-5590. Be sure to ask about our discounts and promotions!

**FACE TESTIMONIALS**



**SKINZINC**  
Zinc Therapy Spray/Drops & Cream for Body & Scalp

**FACE TESTIMONIALS**



**ULTRA LIPOLEAN**  
Fat-blocking systemic Dietary Supplement

**FACE TESTIMONIALS**



**GEL-A-THIN**  
A toned, tummy built & tummy in 19 days!

**FACE TESTIMONIALS**



**ULTRAGIN2**  
Energy Maximizer

**FACE TESTIMONIALS**



**ENDURALEX**  
Better, longer lasting sex

**FACE TESTIMONIALS**



**ACTIFADE**  
Reverse Age Spots gradually while you sleep

**FACE TESTIMONIALS**



**ZDERM**  
Skin Relief Oral Spray  
Skin Relief Cream

ALL SELFWORK  
PRODUCTS ARE PROUDLY  
MADE IN THE USA

**BBBONLINE**  
RELIABILITY  
PROGRAM

**VISA**







## ULTRA LIPOLEAN TESTIMONIALS

BEFORE...



AFTER!



## Share your success story with us!

"I had packed on an extra fifteen pounds that I couldn't seem to get rid of. I tried all the other products on the market but found that they made me feel so nervous that I couldn't work. I found that many of the other diet pills always had a bad side effect and I gained the weight right back after I quit using them. Ultra LipoLean is different. I am pleased with the 15 pounds I have lost so far and the side effects are nil. It was so easy, all I did was take two tablets with eight ounces of water five minutes before eating and the results were great. I'm not one of those people that enjoy the gym or regular workout. I found with Ultra LipoLean that I could lose weight with a minimal amount of exercise. I walk my dog three times a week for 20 minutes and I'm still losing the weight and feeling terrific. Thanks again for supplying me with a safe and easy way to control my weight and feel healthier and younger."

- Barbara R.

"I've been taking Ultra LipoLean for about a month. I've lost 8 of the 10 pounds with no major change in eating habits. I fully intend to keep Ultra LipoLean as a regular part of my nutrition regimen. I've also been thrilled with Ultra Ginz. It's given me amazing energy particularly during my "low" times. It's also made it much easier to concentrate. I couldn't be happier. Thanks and warm regards."

- Ken N.

To receive a FREE 1-month supply of Ultra LipoLean, send us your product success story along with a before/after photo. Mail to:

SELF WORK  
P.O. Box 6418  
Scarborough, Maine 04074

Note: Only testimonials with signatures and before/after photos will be considered.

To order your risk-free trial of Ultra LipoLean by check, money order or credit card, call 1-800-308-5590.

BACK

ALL SELF WORK  
PRODUCTS ARE PROUDLY  
MADE IN THE USA

BDOHLIN  
RELIABILITY  
PROGRAM

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## FREQUENTLY ASKED QUESTIONS: ULTRA LIPOLEAN

What makes Ultra LipoLean different from and more effective than any other fat binder, fat blocker or product containing chitosan?

Ultra LipoLean is different from and more effective than other weight-loss supplements because it contains a powerful patented combination of ingredients called Liposan. Derived by the most advanced technology and processing techniques, Liposan has superior solubility meaning that it breaks down faster than any other fat binder. It also has the highest density and the most superior fat-binding performance available. Within one minute Ultra LipoLean has an 85-to-18 comparison to the top fat binder in fat absorption. Only two tablets of the amazing Ultra LipoLean can absorb up to 20 to 30 grams of fat from a meal. Other fat binders take up to 60 minutes to break down and it takes 10 to 15 tablets to absorb 20 to 30 grams of fat. By using Ultra LipoLean in combination with the "Rapid Weight Loss Guide," you'll experience the easiest, most effective weight-loss-management system available.

How does Ultra LipoLean work?

Ultra LipoLean is a unique, naturally occurring substance derived from the shells of crabs and shrimp, as well as other shellfish fiber (Liposan Ultra), which is chemically attracted to fat and acts as a fat-absorbing sponge inside your body. Within one to five minutes of entering your system, the powerful blend of Ultra LipoLean

ingredients absorbs and binds to fat, and turns it into a mass that your body can't digest. The mass of fat is passed through your body undigested, which means the fat you eat never has a chance to be stored as unwanted fat on your body in places like your inner and outer thighs, your stomach, under your chin, on your arms, etc. And because Ultra LipoLean neutralizes fat after it enters your stomach, the fat has no effect on your body, which forces your body to burn off your already-stored body fat. With the amazing new Ultra LipoLean formula, it's never been easier to get rid of fat, lose weight, and have the LEAN, sculpted body you've always wanted!

Are there any side effects to taking Ultra LipoLean?

There are no KNOWN side effects. However, if you are experiencing upset stomach or gas during your first week of use, this may simply indicate that you haven't had enough fiber in your diet and your system is now adjusting to this new fiber source. Cramping and constipation could indicate inadequate water intake or too much Ultra LipoLean for the amount of fat in a given meal. Also, because Ultra LipoLean is a naturally occurring substance derived from the shells of crabs, shrimp, and other shellfish fiber, you should not take it if you are allergic to shellfish.

Can I use Ultra LipoLean if I'm pregnant or breast-feeding?

Ultra LipoLean is not recommended for pregnant or lactating women, who may need the extra fat in their diet.

Why am I not losing weight as quickly as my friends who are also using Ultra LipoLean?

It's essential that you take Ultra LipoLean as directed for best results. Many people forget to take Ultra LipoLean twice a day, or they skip meals. In addition, many people find that when they exercise, they may not lose weight, but their amount of body fat decreases so there is a loss of inches around the stomach, legs, arms, etc. Also, eating more sensibly with less fat in your diet is recommended to speed up your results.

Can I take more than the recommended dosage?

After two weeks of use, many people prefer to take one or two extra tablets with lunch and dinner to speed up and maximize the results. This is satisfactory with the approval of a physician.

Will using Ultra LipoLean affect my medications?

As with any supplement, if you are taking any medications or if you are under the supervision of a health-care professional, consult with your physician before taking this product. Fat-soluble vitamins, essential fatty acids, oral contraception, and all medications should be taken 4 hours before or after ingesting this product. There are no stimulants in Ultra LipoLean. The only active ingredient is 1100 mg of Liposan Ultra™ fiber.

Can I eat all the fatty foods I want with Ultra LipoLean?

Zinc Sensible eating combined with regular exercise will maximize your results. Using Ultra LipoLean does not mean you can eat more, but you can now have that occasional dessert without feeling guilty about it!

Is Ultra LipoLean approved by the Food and Drug Administration?

Ultra LipoLean is not a drug, so the Food and Drug Administration has not evaluated it.

Do I have to take Ultra LipoLean forever?

Once you reach your weight-loss goal, your body should be more efficient at processing calories. However, many of our customers use a half dosage of Ultra LipoLean, along with sensible eating and exercise, to help maintain their weight. Additionally, many of our customers keep a supply on hand during the holidays or when they know they won't be eating sensibly.

How much weight will I lose?

Many people lose two-four pounds per week, although results can vary between individuals.

When should I take Ultra LipoLean, and how should it be taken?

Take two (2) tablets with an eight-ounce glass of water, twice daily: 1 to 5 minutes before your midday meal, and 1 to 5 minutes before your evening meal.

How many pills are in each bottle of Ultra LipoLean?

There are 120 tablets in each bottle. The tablets are quite small and easy to swallow!

What if I'm not happy with the benefits of Ultra LipoLean?

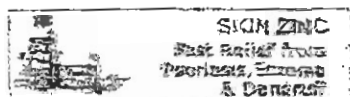
We want you to be completely satisfied with your order. But in the event that you're not happy with your weight-loss results, you may return your order for refund or replacement within 30 days of the date that your order was delivered. Simply call our Customer Care Department at 1-888-249-2367 within the 30-day guarantee period for more details.





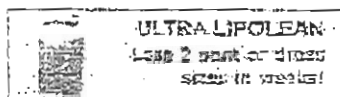
### Click on images below for more PRODUCT TESTIMONIALS

To place a credit card order call 1-800-308-5590. Be sure to ask about our discounts and promotions!



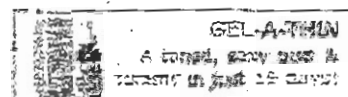
"... (my) condition improved almost immediately... skin on legs returned to normal- only had to use a little bit through summer."

— Thomas Y. — Charlotte NC



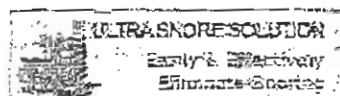
".. Ultra Lipolean is the first diet aid product that has worked for me. I have been taking only 2 [tablets] a day and I have lost 20 lbs in 2 months... I really like the fact that it has no side effects, no shaking or nervousness."

— Sue T.



"(gel-a-thin) has helped me realize that there is something I can do that really works. It has helped my self esteem... gel-a-thin is a lot safer than taking (well-known stimulant diet pills)."

— Janet G. — Moreno Valley, CA



"I used to snore so loud I would wake up my whole family. We've all slept tight since the first night I tried Ultra Snore Solution. We are amazed with the results and would recommend this product to anyone!"

— Bill W.







## ULTRA LIPOLEAN TESTIMONIALS

BEFORE...



AFTER!

Share your success story with us!

"[Ultra LipoLean] has helped me be more confident."  
- Eve P.

"When I started taking Ultra LipoLean my goal was to lose approximately 20 lbs. I have been taking it for 30 days and have lost 12 lbs. I can actually fit into my jeans that were too tight last winter. I love the product. I feel good about myself and my husband says I look great."  
- Teresa C.

"I just wanted to let you know that Ultra LipoLean is the first diet aid product that has worked for me. I have been taking only 2 [tablets] a day and I have lost 20 lbs in 2 months. My goal is to lose another 20-40 lbs. I really like the fact that it has no side effects, no shaking or nervousness."  
- Sue T.

"I wanted to write and tell you how happy my boyfriend and I am with Ultra LipoLean. We absolutely love it and have had really great results. We've been on the Ultra LipoLean for about a month now and within the first two weeks of taking it, I lost 10 pounds (which hasn't come back), and I've gone down two pant sizes. The other wonderful thing about your product that we really like is that it's all-natural, whereas the other diet products we've used in the past are not and have caused us some side effects like shakiness. Ultra LipoLean is the best weight loss product I've ever taken and I don't even have to cut out any of my favorite foods. My boyfriend and I will continue to use your product and know that we will be successful with our weight loss and health. Thank you so much!"

- C. Hovind / K. Ault

"Ultra Lipo Lean has helped me fit into some of my old clothes again."  
- Heather H.

NEXT





## ULTRA LIPOLEAN TESTIMONIALS

Share your success story with us!

BEFORE..



"I just wanted to let you know I am so pleased with your product. My original goal was to lose 10 pounds, so far I've lost 4 lbs. in 3 weeks but what I do see is my arms are less flabby, and my waist actually has some definition now, the love handles are no longer there. I intend to keep up with your product, so that I can reach that goal. Seeing the difference has also given my more motivation to watch how I eat and how much."

- Lori S.

AFTER!



"I've lost about 7-8 lbs. since beginning with Ultra LipoLean. However, I've firmed up considerably in hips and thighs, losing a lot of the dimples associated with cellulite. My clothes fit looser and I feel better about the way I look in them. I am not done yet. Still want to continue taking this product over the next few months, and I also want to start an exercise regimen to firm up even more. One side benefit to using Ultra LipoLean is that while watching my intake of different foods, I still can splurge once in a while and continue to do well."

- Deleena F.

"Finally an all-natural approach to weight loss without the stimulants that actually works! I have lost 5 pounds and, more importantly, one belt size in 3 weeks. Please rush me a three month supply. I love your product."

- J. Leabeater

BACK

NEXT

